

CERTAIN & ZILBERG, PLLC
909 THIRD AVENUE, 28TH FLOOR
NEW YORK, NEW YORK 10022
TEL. 212.687.7800
FAX 212.687.7801

Writer's Extension: x225
Writer's Email: gcertain@certainlaw.com

February 24, 2015

VIA ECF

Hon. William H. Pauley III
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007
Telephone: (212) 805-6387

RE: Beulah Housing Development Fund Company, Inc. v. Blenman
Case No.: 1:14-CV-05777 (WHP) (RLE)

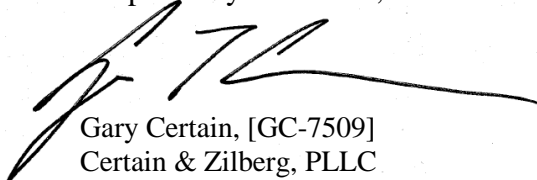
Dear Honorable Judge Pauley:

I am counsel to plaintiff Beulah HDFC, Inc. in the above referenced action and write on behalf of both parties to this action in order to jointly request an extension of the deadline to complete fact and expert discovery. The parties make this request given that scheduling issues and conflicts, including intervenient trials, have prevented the parties from completing discovery. In addition, pursuant to this Court's directive (ECF 8), the parties were engaged in mediation before Magistrate Judge Ronald L. Ellis from December 9, 2015 to December 22, 2015 in an attempt to settle the matter.

This is the first request made for an extension of discovery deadlines. The parties respectfully request an extension of fact discovery deadline until April 28, 2015, the current deadline to complete discovery is February 27, 2015. In addition, the parties seek a deadline of May 29, 2015 for the exchange of expert disclosures.

I thank you for your consideration of this request.

Respectfully submitted,



Gary Certain, [GC-7509]
Certain & Zilberg, PLLC

cc: George D. Vallas, Esq. (by email and ECF)